Supreme Court, U.S.
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No. 92-1278

IN THE

Supreme Court of the United States

OCTOBER TERM, 1992

DAN MORALES, Individually and in his official capacity as Attorney General of the State of Texas,

Petitioner,

v.

TEXAS CATASTROPHE PROPERTY INSURANCE ASSOCIATION, UNION STANDARD INSURANCE COMPANY, and HIGHLANDS INSURANCE COMPANY,

Respondents.

On Petition For Writ Of Certiorari To
The United States Court Of Appeals
For The Fifth Circuit

RESPONDENTS' BRIEF IN OPPOSITION

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March 12, 1993

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QUESTION PRESENTED

May a state constitutionally legislate that an involuntary association of private insurers is required to accept and employ the Attorney General of the state as its legal counsel?

LIST OF PARTIES AND AFFILIATED CORPORATIONS

1.0 Respondents

1.1 Texas Catastrophe Property Insurance Association ("Catpool").

1.2 Union Standard Insurance Company ("Union Standard")
Parent: W.R. Berkley Corporation
Subsidiary: Brookhollow Insurance Agency

1.3 Highlands Insurance Company ("Highlands")
Parent: Highlands Group Insurance, Inc.
Parent: Halliburton Company
Subsidiaries: Highlands Overseas Limited
Highlands Limited
Southern California Bonding Service, Inc.
Underwriters Special Risks, Inc.
Subsidiaries: Highlands Underwriters Insurance Company
Highlands Casualty Company
Aberdeen Insurance Company
Halliburton Holdings, Inc.
Halliburton Holdings, Ltd.
Highlands Insurance Company (U.K.),Ltd.
Highlands Underwriting Agents, Ltd.

2.0 Petitioner

Dan Morales, Individually and in his official capacity as Attorney General of the State of Texas.

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DAN MORALES, Individually and in his official capacity as Attorney General of the State of Texas,
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Respondents.

RESPONDENTS' BRIEF IN OPPOSITION

The Respondents, Texas Catastrophe Property Insurance Association ("Catpool"), Union Standard Insurance Company ("Union Standard"), and Highlands Insurance Company ("Highlands"), respectfully request that this Court deny the petition for writ of certiorari seeking review of the Fifth Circuit's judgment in this case. The opinion of the Fifth Circuit is reported at 975 F.2d 1178.

STATEMENT OF THE CASE

In its statement of the case, Petitioner omits a number of crucial facts about Catpool. Respondents therefore submit the following brief statement of their own.

The Texas Catastrophe Property Insurance Association ("Catpool") was created in 1971 for the purpose of providing property insurance in high-risk areas of the state where an adequate private insurance market was unavailable. Tex. Ins. Code Ann. art. 21.49, §§ 1, 4(a) (Vernon 1981). It is an involuntary association of all property insurers in Texas, and is held together by the requirement that insurers remain members as a condition of their authority to transact business within the state. *Id.* But for this requirement, the Catpool would have no members, since membership in Catpool is not in the economic best interest of insurers (Tr. 39, 41, 61).

The Catpool, unlike an assigned risk pool, writes its own policies of insurance (Tr. 25-26) and pays its own claims (Tr. 26). Operating expenses and funds to pay losses come first from premiums collected, and then from assessments collected from members. Tex. Ins. Code Ann. art. 21.49, § 5 (Vernon Supp. 1993). Contrary to Petitioner's assertion, these assessments are set by Catpool's Board of Directors, and not by the State Board of Insurance. (Tr. 39-40); Tex. Ins. Code Ann. art 21.49, § 5(d) (Vernon Supp. 1993). Catpool receives no state funds and its employees receive no state salaries or benefits (Tr. 33). It receives no exemption from state sales taxes (Tr. 34) or premium taxes upon the policies it writes (D.Ex. 2). Under an Internal Revenue Service ruling, it files federal tax returns as a partnership and not as a state agency (Tr. 47). Losses of the Catpool are assessed against the member companies in proportion to their market share of property insurance writings, with consideration given to their voluntary writings which would otherwise be written by Catpool. Tex. Ins. Code Ann. art. 21.49, § 5(b) (Vernon Supp. 1993). Any profit of the association (although largely theoretical) would be apportioned between the members in the same way. *Id.* Realistically though, potential liability on Catpool policies

exceeds premium receipts by billions of dollars (Tr. 27), and represents the biggest exposure borne by many of Catpool's members (Tr. 53).

The Catpool has not been endowed with any of the state's powers. It does not make rules to be applied to others, it has no power to enforce rules, and it holds no hearings to determine the rights of others. See, Tex. Ins. Code Ann. art. 21.49 (Vernon 1981 and Vernon Supp. 1993). It is solely in the business of writing insurance policies. The Catpool is heavily regulated and overseen in this endeavor both by the Act creating it, and by the Texas Department of Insurance and State Board of Insurance, which are state agencies created for the purpose of regulating the business of insurance in Texas. Tex. Ins. Code Ann. arts. 1.01A, 1.02 (Vernon Supp. 1993). The Catpool has the right to appeal orders of those agencies which it deems to adversely affect it. Tex. Ins. Code Ann. art. 21.49, § 9 (Vernon Supp. 1993).

Effective September 1, 1991, the Texas Catastrophe Property Insurance Pool Act was amended to require Catpool to be represented by the Attorney General of Texas. Tex. Ins. Code Ann. art. 21.49, § 12A (Vernon Supp. 1993). Conspicuously, the change in Catpool's governing act did not make that association a state agency for all purposes. To the contrary, the declaration of sovereignty was limited solely to the purpose of legal representation.

Respondents filed suit shortly thereafter complaining that the amendment deprived them of their constitutional right to retained counsel of their choice in civil matters. This proceeding arises out of the district court's ruling granting Respondents' request for a preliminary injunction and restraining the Petitioner from assuming legal representation of the Catpool pending final resolution of its suit. The Fifth Circuit affirmed the decision of the district

court that Catpool and its members had shown a substantial likelihood of success on the merits,[1] and the Attorney General then filed its petition with this Court.

REASONS WHY THE PETITION SHOULD BE DENIED

A. The Fifth Circuit's Analysis and Decision in This Case are Correct.

The Fifth Circuit correctly held that the Constitution of the United States and the due process principles embodied therein guarantee to private citizens the right to retain hired counsel in civil matters (Opinion of Fifth Circuit at pp. 1180-81), citing a number of cases including a prior decision of this Court.[2] It further held that the right is not absolute, and may be overridden by a state if that state can show "compelling reasons" therefor. (Opinion of Fifth Circuit at p. 1181). However, the Attorney General did not offer any such compelling reasons and the Fifth Circuit expressly so found. The Fifth Circuit also held, in keeping with well established principles of law, that a state agency has no

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[1] The Fifth Circuit correctly stated in its opinion that the district court's rulings on the other three issues ordinarily involved in a preliminary injunction hearing; i.e. a substantial threat of irreparable injury, relative lack of harm to the opponent, and the public interest; were not disputed by the Attorney General and were properly resolved by the district court. (Opinion of the Fifth Circuit at p. 1180).

[2] *See, e.g., Powell v. Alabama*, 287 U.S. 45, 69, 53 S.Ct. 55, 64, 77 L.Ed. 158 (1932); *McCuin v. Texas Power & Light Co.*, 714 F.2d 1255, 1262-65 (5th Cir. 1983); *Mosley v. St. Louis Sw. Ry.*, 634 F.2d 942, 945-46 (5th Cir. Unit A Jan. 1981), *cert. denied*, 452 U.S. 906, 101 S.Ct. 3032, 69 L.Ed.2d 407 (1981); *Potashnick v. Port City Constr. Co.*, 609 F.2d 1101, 1117 (5th Cir.), *cert. denied*, 449 U.S. 820, 101 S.Ct. 78, 66 L.Ed.2d 22 (1980); *accord, Gray v. New England Tel. & Tel. Co.*, 792 F.2d 251, 257 (1st Cir. 1986).

constitutional rights to assert against the state of which it is a part, citing *Trustees of Dartmouth College v. Woodward*, 17 U.S. (4 Wheat.) 518, 629-30, 4 L.Ed. 629 (1819); and *Board of Levee Comm'rs of the Orleans Levee Board v. Huls*, 852 F.2d 140, 143 (5th Cir. 1988).

None of these principles of law is in dispute. Rather, it is their application to the Catpool which is the central issue in this case. As stated by the Fifth Circuit, the relevant inquiry is one of identity. If Catpool is a part of the state, as posited by the Petitioner, then it may not assert the due process right to retain hired counsel against the State of Texas. However, if Catpool is not a part of the state, but rather an association of private citizens, then Texas may not constitutionally legislate that it is required to accept and employ the Attorney General of the state as its legal counsel, and Section 12A of Article 21.49 is unenforceable. The District Court held that Catpool was not a part of Texas' state government and the Fifth Circuit affirmed its decision. These actions were correct and do not require reconsideration by this Court.

Petitioner argues that Catpool is a part of the state or is a "state entity" because its exists solely by virtue of the state's coercive power, and analogizes Catpool to the State Bar's Grievance Committee, citing *McGregor v. Clawson*, 506 S.W.2d 922, 929 (Tex. Civ. App.--Waco 1984, *original proceeding*). The district court quickly disposed of this argument in its Order (p. 17), and the Fifth Circuit apparently saw no reason even to discuss it.

The simple fact is that every corporation in the United States exists because of the coercive power of some state, and each such corporation may have its charter revoked if it fails to comply with the requirements of its creator-state. The coercive power of which the Petitioner speaks is simply

the power of government to regulate, and to enforce its regulations. By exercising that power, a state does not convert an otherwise private organization into a state agency without constitutional rights. More than that is necessary to create a state agency.

The Fifth Circuit has aptly stated the crucial difference in its opinion in this case:

> State government, as it may be conceived for our present purposes, is a great compendium of powers. It may make laws governing a vast array of activities, as is evidenced by the shelves filled with state statutes on myriad subjects. Sometimes, for the sake of convenience, a state will squeeze off some of this power to a political subdivision that it has created, such as a municipality or a levee board. Then that smaller state entity--that "political subdivision" or "auxiliar[y]" or "arm" of the state--takes charge of the function assigned to it and exercises the power delegated to it.

(Opinion of the Fifth Circuit at p. 1182, citing *City of Trenton v. New Jersey*, 262 U.S. 182, 185, 43 S.Ct. 534, 536, 67 L.Ed. 937 (1923); *Town of Mount Pleasant v. Beckwith*, 100 U.S. 514, 524, 25 L.Ed. 699 (1880); and *City of Pawhuska v. Pawhuska Oil & Gas Co.*, 250 U.S. 394, 398, 39 S.Ct. 526, 528, 63 L.Ed. 1054 (1919)).

It is this delegation of state power to the organization that distinguishes Catpool from the State Bar and its Grievance Committee, and the case of *McGregor*. The State Bar and its Grievance Committee have been entrusted with the regulation of lawyers and the hearing of complaints regarding lawyers' conduct. Those entities administer the law with

regard to lawyers and they do not practice law as do their members. In contrast, Catpool does not regulate or exercise contested case powers over insurance companies, and it does insure against property loss, just as do its members. Its power to write insurance contracts is not delegated to it by the state, but comes from the financial strength of its members. The Attorney General's Office itself has historically expressed this same opinion:

> The Association [Catpool] is a statutorily mandated association of private insurance companies. It operates on assessment fees collected from its member insurance companies; it receives no funds from the state. . . The association in no manner acts with the sanction of the state . . .

Tex. Atty. Gen. Op. JM-67 (1983). No significant changes have been made in the manner of funding or operating Catpool since the Attorney General rendered this opinion. The only explanation for the Attorney General's retreat from this position is the addition to the Catpool statute of Section 12A.

Assuming for the sake of argument that the State of Texas, acting as a sovereign and exercising its powers as such, could become a property insurer, contracting with private citizens, collecting premiums, and paying claims, to do so it would have to dedicate state resources, state personnel and state funds to its operation. Such an organization would truly be a part of the state--as the state's agent, its financial interests would be synonymous with the financial interests of the state, and it would appropriately be represented by the Attorney General. The Fifth Circuit imagined such an agency and pointed to the key difference between it and Catpool--the funds.

As set out in the Statement of the Case, above, Catpool operates with private money. It collects premiums in exchange for services it provides and it receives no state assistance in the payment of its employees or its operating expenses. When it has an operating loss, it recoups that loss by assessing its member companies. If it made a profit, that profit would be shared among its members. Whether or not it is constitutional to impose such obligations on the property insurers of the state, the insurance companies have accepted the responsibility. They have never contested the basic framework of this legislation and do not do so in this suit. What they do contest is the State's current attempt to completely remove their right to protect their funds by fiat, providing that the Attorney General exclusively represent their interests. In this, the Legislature has gone too far.

The legal representation of Catpool directly impacts the financial well-being of its member companies, not of the state. For instance, Catpool's lawyers have historically represented them in a number of battles regarding payment of claims made by insureds. *See, e.g., Texas Catastrophe Property Ins. Ass'n v. Council of Co-Owners of Saida II Tower Condominium Ass'n*, 706 S.W.2d 644 (Tex. 1986); *Rowden v. Texas Catastrophe Prop. Ins. Ass'n*, 677 S.W.2d 83 (Tex. App.--Corpus Christi 1984, *writ ref'd n.r.e*); and *Texas Catastrophe Prop. Ins. Ass'n v. Miller*, 625 S.W.2d 343 (Tex. Civ. App.--Houston [14th Dist.] 1981, *writ dism'd*). Whether or not claims are paid, and the amounts of such payments, directly determine and define the amount of the assessments against Catpool's members in a given year. Further, Catpool is subject to civil suits and liability for unfair or deceptive insurance trade practices under Tex. Ins. Code Ann. art. 21.21 (Vernon 1981 and Vernon Supp. 1993). Treble damage awards are permitted in actions brought under that statute. *Id.* Any awards rendered against

Catpool thereunder would also have to be paid out of the private funds of the members, and not by the State of Texas.

These private financial interests of Catpool and its members are ones which the Attorney General of Texas can not adequately or legally represent by definition. Tex. Const. art. 4, § 22 (Vernon 1984); Tex. Gov't Code Ann. §§ 402.021, 402.0211, 402.0212, 402.045, and 402.055 (Vernon 1990 and Vernon Supp. 1993). It is true that Texas and the public have an interest in seeing that insurance is provided to property owners along the coast, thereby promoting development of that region, but that "public interest" is no different than society's interest in every piece of benevolent legislation ever enacted. That interest does not give the State of Texas the authority to deprive private property insurance companies of the right, guaranteed to them by the Constitution of the United States, to employ counsel of their choosing to represent their interests when and as they see fit.

Finally, Petitioner directs this Court's attention to another organization in Texas which is similar to Catpool, the Texas Workers' Compensation Insurance Facility ("TWCIF"). That entity was created by statute in 1953, and also collectively provides insurance as a condition of its members' authority to do business in Texas utilizing only private funds. It recently received the same treatment by the Legislature as did the Catpool, through an amendment to its governing statute which designated the Attorney General as its legal representative. Tex. Ins. Code Ann. art. 5.76-2, § 2.05(j) (Vernon Supp. 1993). The Attorney General would have this Court grant certiorari and decide this case in order that Texas have guidance not only as to the nature of Catpool, but as to the status of TWCIF and other similar but unnamed entities. What the Petitioner fails to mention is that when its legislation was amended, the TWCIF filed a lawsuit

virtually identical to this one in state district court, challenging the validity of the offending provisions on the same due process grounds as asserted here by the Catpool. The state court ruled that TWCIF and its members had demonstrated a probable right of recovery on the merits of their suit, and preliminarily enjoined the Attorney General from enforcing the amendment in question, on the same grounds as discussed herein. (*See*, Order, dated January 7, 1992; *Texas Workers' Compensation Insurance Facility, et al. v. Dan Morales*, Cause No. 91-17346, 200th Judicial District Court of Travis County, Texas.) Thus, the Petitioner is already receiving the guidance it desires this Court to provide with respect to TWCIF from its own state judicial system.

For all of these reasons, the district court correctly decided that Catpool and its members had demonstrated a substantial likelihood of success on the merits of their suit. The Fifth Circuit correctly analyzed and affirmed that decision. Consequently, there is nothing presented to this Court which requires its action.

B. The Fifth Circuit's Analysis and Decision are Consistent With Prior Rulings of the Supreme Court, as Well as the First Circuit's Treatment of This Issue in a Parallel Case.

The Petitioner states as a reason for granting his requested writ that the Fifth Circuit's decision is contrary to prior rulings of the Supreme Court. However, his argument seems to be that the Fifth Circuit failed to apply the principle that state agencies can not assert constitutional rights against the state to Catpool. The Fifth Circuit declined to do so for all of the reasons set forth in its opinion. It did not make any holding which undercuts the basic principle of federalism set forth in *Trustees of Dartmouth College v. Woodward*, 17

U.S. (4 Wheat) 518, 629-30, 4 L.Ed. 629, 657 (1819). Its decision is wholly consistent with that case, which applies only to a state's civil institutions, adopted for internal government who receive a grant of political power, whose funds are public property, and in whose transactions the state alone is interested. *Id.*

Its decision is further consistent with a similar case recently decided in the First Circuit. In *Medical Malpractice Joint Underwriting Ass'n v. Pfeiffer*, 832 F.2d 240 (1st Cir. 1987), the First Circuit considered a case involving a constitutional challenge by a statutory entity strikingly similar to Catpool. The State of Rhode Island argued, as does the Attorney General of Texas, that it had created the association and that the association therefore had no constitutional rights to assert and no standing to sue. The *Pfeiffer* court summarily, succinctly and appropriately disposed of the contention as follows:

> However, a state cannot conscript an entire profession into an involuntary association and thus make it an "integral component of state government" without standing to protect its interests from that government.

Id. at p.244. In a related opinion involving the same association, it was held that "...it makes no difference whether the association is voluntary or involuntary because the state cannot require members to belong and then deny them the right to collectively protect their interests." *Medical Malpractice Underwriting Ass'n v. Paradis*, 756 F.Supp. 669, 674 (D.R.I. 1991). There is no reason why this Court should deal with the present case any differently than the First Circuit dealt with the similar Rhode Island association.

CONCLUSION

The Texas Catastrophe Property Insurance Association is an involuntary association of private companies which was created and exists to fulfill the Texas Legislature's directive that the property insurance industry collectively insure against losses which might be incurred in the event of a hurricane on the Texas gulf coast, upon pain of forfeiting their licenses to do business in the state. The industry has accepted its role in this regard and has endeavored for some twenty years to carry out the edict of the State of Texas, while also trying to keep its resulting out-of-pocket losses as low as possible. The State of Texas has now attempted, through its addition of Section 12A of Article 21.49 to the Texas Insurance Code, to have its lawyer, and no other lawyer, represent the interests of the insurance industry in all matters related to the Catpool endeavor. For all of the reasons set forth above, at the Fifth Circuit, and at the district court, the Constitution of the United States protects the insurance companies from having to accept that lawyer's services.

This case presents no error for this Court to review. Its holdings are absolutely consistent with principles of federalism, prior decisions of this Court, and treatment of a similar entity in similar circumstances by the First Circuit. Therefore, this petition for writ of certiorari should be denied, and Respondents respectfully so pray.

Respectfully Submitted,

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